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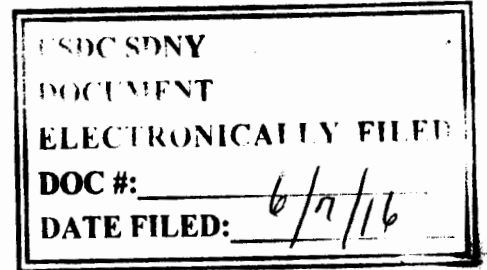
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June 6, 2016

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Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Goodman, et ano v. Sanctuary Records Group, Ltd., et al.
Case No.: 16 CIV. 1005 (VM)

Dear Judge Marrero:

We are the attorneys for plaintiffs, and are writing with respect to Your Honor's March 11, 2016 Order extending defendants' time to respond to the complaint to June 13, 2016.

As part of the ongoing settlement discussions a confidentiality waiver is necessary from one of the parties to this action, and we are waiting for this party to provide consent. We therefore respectfully request that defendants' time to respond to the complaint be extended for an additional sixty (60) days and that briefing on the pending motion to remand be stayed for the same period.

Respectfully yours,


JAMES P. CINQUE

JPC:kc

cc: Lindsay Bowen, Esq. (Via E-mail Transmission)
Lita Rosario, Esq. (Via E-mail Transmision)

